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Attorneys for Defendants

*Inter-Services Intelligence Directorate of the Islamic Republic of Pakistan,
Lieutenant General Nadeem Taj
Lieutenant General Ahmed Shuja Pasha*

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

X

SHIMON ROSENBERG et al.,

: 1:10-cv-05381

Plaintiff,

-against-

**NOTICE OF MOTION TO DISMISS BY
DEFENDANTS, INTER-SERVICES
INTELLIGENCE DIRECTORATE OF
THE ISLAMIC REPUBLIC OF
PAKISTAN, AHMED SHUJA PASHA
AND NADEEM TAJ**

ORAL ARGUMENT REQUESTED

X

KIA SCHERR, Individually, and as Personal
Representative of the Estates of Naomi Scherr and
Alan Scherr,

: 1:10-cv-05382

Plaintiff,

-against-

LASHKAR-E-TAIBA et al.,

:

Defendants.

X

EMUNAH CHROMAN, Individually, and as
Personal Representative of the Estate of Ben Zion
Chroman,

: 1:10-cv-05448

Plaintiff,

-against-

LASHKAR-E-TAIBA et al.,

:

Defendants.

X

PLEASE TAKE NOTICE that, pursuant to Order of the Court as noted on the dockets of these cases on April 13, 2011, and upon the Declaration of Maulvi Anwar ul Haq, sworn to on May 5, 2011, and the exhibit attached thereto, the Declaration of Kevin J. Walsh, sworn to on May 6, 2011, and the exhibits attached thereto, the accompanying Memorandum of Law, and upon the Complaint herein;

Defendants, Inter-Services Intelligence Directorate of the Islamic Republic of Pakistan (“ISI”), former Director General of ISI Lieutenant General Nadeem Taj, and current Director General of ISI Lieutenant General Ahmed Shuja Pasha (collectively “ISI Defendants”), will move this Court, before the Honorable Judge Dora L. Irizarry at the United States Courthouse at 225 Cadman Plaza East, Brooklyn, New York, at 9:30 A.M. on July 14, 2011, or as soon thereafter as counsel can be heard, for an order, pursuant to Rule 12(b)(1) of the Federal Rules of Civil Procedure, dismissing the Complaints against the ISI Defendants for lack of subject matter jurisdiction.

Dated: New York, New York
May 6, 2011

LOCKE LORD BISSELL & LIDDELL LLP

By:

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